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SURFACE TRANSPORTATION BOARD

Washington, DC 20423

Office of Economics, Environmental Analysis, and Administration

February 15, 2005

Mr. David Coburn, Esq.
Steptoe & Johnson, LLP
1330 Connecticut Avenue, NW
Washington, DC 20036-1795

Re: STB Finance Docket 34284, Southwest Gulf Railroad
Company Construction and Operation Exemption – Medina
County, TX – **Request for Information**

Dear Mr. Coburn:

The Surface Transportation Board's Section of Environmental Analysis (SEA) is currently reviewing the comment letters received on the Draft Environmental Impact Statement (EIS) for Southwest Gulf Railroad Company's (SGR) proposed rail line construction and operation, issued on November 5, 2004. We are writing to request information from SGR regarding certain issues that have been raised in the comment letters. We will likely submit additional requests for information to SGR as we continue our review of the comments.

Please provide the information requested below. If any of the requested information is unavailable, please provide an explanation in your response.

1. Alternative Rail Routes: SGR has provided information stating that initially a total of fifteen potential rail routes between Vulcan Construction Materials, LP's (VCM) proposed quarry and the Union Pacific Railroad Company (UP) rail line had been identified. These fifteen routes consisted of eight different potential routes and seven minor variations from some of these eight routes. After assessing the fifteen route variations using certain criteria, SGR determined that four routes warranted further evaluation, and that 11 should be eliminated.

Please provide a map delineating all fifteen identified rail routes and information specifying the reasons for eliminating eleven of these potential routes from further evaluation. We request that the reasons for elimination be specified separately for each of the eleven routes.

Commenters have suggested that reasonable and feasible alternative rail routes, other than those studied in the Draft EIS, exist and should be developed, particularly alternative routes that bypass the Quihi, Texas area. Please provide information as to whether SGR has studied the feasibility of rail routes that are farther to the west or farther to the east of the four alignments studied in the Draft EIS (if not included in the discussion of the eleven routes eliminated from further consideration requested above). If so, please provide as much information as possible regarding these routes, such as detailed maps, engineering requirements, and any environmental considerations.

2. Cut and Fill: SGR had previously indicated that final cut and fill volumes of the potential rail alignments had not been determined. If the cut and fill volumes have now been determined, please provide SEA with this information for all alternative rail routes for which this information is available, including those SGR eliminated from further evaluation. If SGR has determined the cut and fill volumes that would be required for an alignment or alignments that would utilize portions of the Medina Dam route, please provide this information as well.
3. Road upgrades: Commenters have challenged the feasibility of using trucks to transport limestone from VCM's quarry to the UP rail line, assessed as part of the no-action alternative in the Draft EIS. In particular, commenters have stated that the current road infrastructure could not support the amount of truck traffic that has been projected and that it would not be possible for VCM to transport the limestone by truck.

Although SGR has provided some information regarding which roadways would be used by the limestone-hauling trucks, has indicated that VCM may develop a private road, and has stated that VCM would work with Medina County officials on the specifications of any road upgrades, SEA requests that SGR provide more detailed information on any needed road upgrades and the construction of the private roadway. Please provide information on the specifications of the roadway upgrades and the construction of the private road, including the approximate length of construction time, the number of workers involved in the roadway construction, the frequency of maintenance needed, the width requirements for the roadways, and plans to take into consideration stream and floodplain crossings. Are there any approvals for the roadway upgrades that VCM would be required to obtain?

The Medina County Environmental Action Association has submitted photographs showing that area roadways are subject to flooding that would impede traffic. Please provide information indicating how VCM plans to operate trucks on these roadways during periods of flooding.

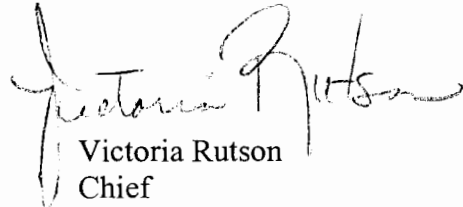
4. Location of the Maintenance and Fueling Facility: Several commenters have expressed concern regarding the proximity of the maintenance and fueling facility

to the Edwards Aquifer Recharge Zone. Please provide a detailed, small-scale map showing the planned location of this facility in relation to the recharge zone.

5. Maintenance Activities: SGR has stated that it would maintain the right-of-way consistent with rail industry standards and the need to minimize fire hazards. Commenters have requested more detailed information regarding maintenance activities. Please provide any additional information regarding maintenance of the right-of-way, including vegetation control, that SGR has developed to date.
6. Fencing: SGR has stated that it intends to use appropriate fencing on both sides of the right-of-way, from the quarry site to the UP line. The Texas Parks and Wildlife Department has requested information regarding the height and mesh size of the fencing. Please provide this information.

We thank you in advance for your cooperation and your response to this information request. If you need additional information or have any questions, please do not hesitate to contact me or Rini Ghosh of my staff at (202)565-1539.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Rutson". The signature is fluid and cursive, with the first name "Victoria" written in a larger, more prominent script than the last name "Rutson".

Victoria Rutson
Chief
Section of Environmental Analysis